

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SUNPOWER CORPORATION,¹

Wind-Down Debtor.

)
) Chapter 11
)
) Case No. 24-11649 (CTG)
)
)
)

**NOTICE OF *AMENDED*² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON APRIL 22, 2025 AT 10:00 A.M. (EDT)**

**THIS PROCEEDING WILL BE CONDUCTED IN-PERSON
AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT
OF DELAWARE, 824 NORTH MARKET STREET, 5TH FLOOR,
COURTROOM NO. 4, WILMINGTON, DELAWARE 19801.**

**ALL COUNSEL AND WITNESSES ARE EXPECTED TO ATTEND UNLESS
PERMITTED TO APPEAR REMOTELY VIA ZOOM.**

**PLEASE REFER TO JUDGE GOLDBLATT’S CHAMBERS PROCEDURES
([HTTPS://WWW.DEB.USCOURTS.GOV/JUDGE-CRAIG-T-GOLDBLATT](https://www.deb.uscourts.gov/judge-craig-t-goldblatt)) AND THE
COURT’S WEBSITE ([HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-
APPEARANCES](http://www.deb.uscourts.gov/ecourt-appearances)) FOR INFORMATION ON WHO MAY PARTICIPATE REMOTELY,
THE METHOD OF ALLOWED PARTICIPATION (VIDEO OR AUDIO), JUDGE
GOLDBLATT’S EXPECTATIONS OF REMOTE PARTICIPANTS, AND THE
ADVANCE REGISTRATION REQUIREMENTS.**

**REGISTRATION IS REQUIRED BY 4:00 P.M. (EASTERN TIME) THE BUSINESS DAY
BEFORE THE HEARING UNLESS OTHERWISE NOTICED USING
THE ECOURTAPPEARANCES TOOL AVAILABLE ON THE COURT’S WEBSITE.**

¹ The Wind-Down Debtor in this chapter 11 case, along with the last four digits of the Wind-Down Debtor’s federal tax identification number, is: SunPower Corporation (8969) (“SunPower”). On February 18, 2025. The Court entered an order closing the chapter 11 cases of SunPower’s debtor affiliates (collectively, the “Closing Debtors”). The Closing Debtors, along with the last four digits of the Closing Debtor’s federal tax identification number, are: SunPower Corporation, Systems (8962); SunPower Capital, LLC (8450); SunPower Capital Services, LLC (9910); SunPower HoldCo, LLC (0454); SunPower North America, LLC (0194); Blue Raven Solar, LLC (3692); Blue Raven Solar Holdings, LLC (4577); BRS Field Ops, LLC (2370); and Falcon Acquisition HoldCo, Inc. (3335). The location of the Wind-Down Debtor’s service address for purposes of this chapter 11 case is: 655 15th Street, NW, Suite 600, Washington, DC 20005, Attn: Mark Roberts, in his capacity as the Plan Administrator.

² Amended agenda items appear in bold.

I. WITHDRAWN MATTERS:

1. Motion of CWD Loma, Inc. for Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1)(a) [[Docket No. 1144](#); filed December 12, 2024]

Response/Objection Deadline: December 26, 2024 at 4:00 p.m. (EST); extended to February 6, 2025 at 4:00 p.m. (EST) for the Plan Administrator; further extended to April 15, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received:

- A. Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1188](#); filed December 23, 2024]
- B. *Amended* Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1198](#); filed December 30, 2024]
- C. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1312](#); filed February 6, 2025]

Related Documents:

- i. Notice of Withdrawal of Docket No. 1144 [[Docket No. 1416](#); filed March 31, 2025]

Status: On March 31, 2025, the movant filed a notice of withdrawal in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

2. Motion of Sonepar Key Accounts, LLC for Allowance and Payment of Administrative Expense Claim [[Docket No. 1157](#); filed December 13, 2024]

Response/Objection Deadline: December 27, 2024 at 4:00 p.m. (EST); extended to February 6, 2025 at 4:00 p.m. (EST) for the Plan Administrator; further extended to April 15, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received:

- A. Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1188](#); filed December 23, 2024]
- B. *Amended* Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1198](#); filed December 30, 2024]
- C. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1312](#); filed February 6, 2025]

Related Documents:

- i. Notice of Withdrawal of Motion [[Docket No. 1389](#); filed March 13, 2025]

Status: On March 13, 2025, the movant filed a notice of withdrawal in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

II. ADJOURNED MATTERS:

- 3. Motion of Meritage Homes of California a/k/a Meritage Homes the Northern California and Southern California Divisions, for Relief from Stay, to Exercise its Setoff Rights if the Debtor and Court do Not Acknowledge that Withheld Sequestered Funds are Not Property of the Estate and Should be Distributed Directly to Allowed Unpaid Subcontractors of SunPower Pursuant to 11 U.S.C. §§ 105(a), 362(d) and 553(a) and Pursuant to the Amended Joint Chapter 11 Plan of SunPower and its Debtors Affiliates at Article VIII Section E [[Docket No. 867](#); filed October 18, 2024]

Response/Objection Deadline:

November 1, 2024 at 4:00 p.m. (EDT); extended to December 2, 2024 at 4:00 p.m. (EST) for the Debtors; further extended to February 13, 2025 at 4:00 p.m. (EST); further extended to April 15, 2025 at 4:00 p.m. (EDT); further extended to June 16, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received:

A. Informal comments from the Debtors and the Plan Administrator

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on June 23, 2025 starting at 10:00 a.m. (EDT).

4. Motion of Complete Solaria, Inc. for Allowance and Payment of Administrative Expense Claim [[Docket No. 1130](#); filed December 10, 2024]

Response/Objection Deadline: December 24, 2024 at 4:00 p.m. (EST); extended to February 6, 2025 at 4:00 p.m. (EST) for the Plan Administrator; further extended to April 15, 2025 at 4:00 p.m. (EDT); further extended to a date to be determined

Responses/Objections Received:

A. Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1188](#); filed December 23, 2024]

B. *Amended* Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1198](#); filed December 30, 2024]

C. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1312](#); filed February 6, 2025]

Related Documents:

- i. Notice of Hearing [[Docket No. 1133](#); filed December 11, 2024]

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on June 23, 2025 starting at 10:00 a.m. (EDT).

5. Motion of KB Home South Bay Inc., KB Home Greater Los Angeles Inc., KB Home Sacramento Inc., KB Home Coastal Inc., KB Home Raleigh-Durham Inc., and KB Home Service Company LLC for Allowance and Payment of Administrative Expense Claims [[Docket No. 1148](#); filed December 13, 2024]

Response/Objection Deadline: December 27, 2024 at 4:00 p.m. (EST); extended to February 6, 2025 at 4:00 p.m. (EST) for the Plan Administrator; further extended to April 15, 2025 at 4:00 p.m. (EDT); further extended to a date to be determined

Responses/Objections Received:

- A. Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1188](#); filed December 23, 2024]
- B. *Amended* Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1198](#); filed December 30, 2024]
- C. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1312](#); filed February 6, 2025]

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on June 23, 2025 starting at 10:00 a.m. (EDT).

- 6. Oracle's Request for Allowance and Payment of Chapter 11 Administrative Expenses [[Docket No. 1149](#); filed December 13, 2024]

Response/Objection Deadline: January 10, 2025 at 4:00 p.m. (EST); extended to February 6, 2025 at 4:00 p.m. (EST) for the Plan Administrator; further extended to April 15, 2025 at 4:00 p.m. (EDT); further extended to a date to be determined

Responses/Objections Received:

- A. Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1188](#); filed December 23, 2024]
- B. *Amended* Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1198](#); filed December 30, 2024]

- C. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1312](#); filed February 6, 2025]

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on June 23, 2025 starting at 10:00 a.m. (EDT).

7. D.R. Horton's Request for Allowance and Payment of Administrative Expense Claim [[Docket No. 1153](#); filed December 13, 2024]

Response/Objection Deadline: December 27, 2024 at 4:00 p.m. (EST); extended to February 6, 2025 at 4:00 p.m. (EST) for the Plan Administrator; further extended to April 15, 2025 at 4:00 p.m. (EDT); further extended to a date to be determined

Responses/Objections Received:

- A. Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1188](#); filed December 23, 2024]
- B. *Amended* Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1198](#); filed December 30, 2024]
- C. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1312](#); filed February 6, 2025]

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on June 23, 2025 starting at 10:00 a.m. (EDT).

8. Motion of SMA Solar Technology America LLC for Allowance and Payment of Administrative Expense Claim [[Docket No. 1162](#); filed December 13, 2024]

Response/Objection Deadline: December 27, 2024 at 4:00 p.m. (EST); extended to February 6, 2025 at 4:00 p.m. (EST) for the Plan Administrator; further extended to April 15, 2025 at 4:00 p.m. (EDT); further extended to a date to be determined

Responses/Objections Received:

- A. Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1188](#); filed December 23, 2024]
- B. *Amended* Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1198](#); filed December 30, 2024]
- C. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1312](#); filed February 6, 2025]

Related Documents:

- i. Declaration of Teresa Kelley in Support of Motion of SMA Solar Technology America LLC for Allowance and Payment of Administrative Expense Claim [[Docket No. 1164](#); filed December 13, 2024]

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on June 23, 2025 starting at 10:00 a.m. (EDT).

- 9. Motion for Allowance and Immediate Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1)(a) filed by Leonard Roofing, Inc. [[Docket No. 1201](#); filed December 31, 2024]

Response/Objection Deadline: February 6, 2025 at 4:00 p.m. (EST); extended to April 15, 2025 at 4:00 p.m. (EDT); further extended to a date to be determined

Responses/Objections Received:

- A. Further Omnibus Reservation of Rights of the Plan Administrator Concerning Various Pending Motions Seeking Allowance and Payment of Asserted Administrative Expense Claims [[Docket No. 1312](#); filed February 6, 2025]

Status: The hearing on this matter is adjourned to the hearing scheduled to take place on June 23, 2025 starting at 10:00 a.m. (EDT).

III. RESOLVED MATTER:

10. Motion of Creditor Trustee for Entry of an Order Further Enlarging the Period Within Which the Creditor Trustee May Remove Actions [[Docket No. 1374](#); filed March 2, 2025]

Response/Objection Deadline: March 17, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received: None

Related Documents:

- i. Certification of Counsel Regarding Motion of Creditor Trustee for Entry of an Order Further Enlarging the Period Within Which the Creditor Trustee May Remove Actions [[Docket No. 1407](#); filed March 21, 2025]
- ii. Amended and Superseding Order Enlarging the Period Within Which the Creditor Trustee and the Plan Administrator May Remove Actions [[Docket No. 1412](#); entered March 24, 2025]

Status: On March 24, 2025, the Court entered an order in connection with this matter. Consequently, no hearing with respect to this matter is required.

IV. MATTERS FILED UNDER CERTIFICATION OF COUNSEL:

11. The Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive) [[Docket No. 1369](#); filed February 28, 2025]

Response/Objection Deadline: March 21, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received:

- A. See **Exhibit A** attached

Related Documents:

- i. Re-Notice of "The Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)" and Hearing Thereon [[Docket No. 1381](#); filed March 10, 2025]
- ii. Notice of Submission of Copies of Proofs of Claim [[Docket No. 1421](#); filed April 8, 2025]

- iii. Plan Administrator's Preliminary Reply to "Solar Savings Direct, Inc.'s Response to the Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)" [D.I. 1386] [[Docket No. 1452](#); filed April 16, 2025]
- iv. Plan Administrator's Preliminary Reply to "Solar Savings Direct, Inc.'s Response to the Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)" [D.I. 1386] [[Docket No. 1452](#); filed April 16, 2025]
- v. Certification of Counsel Concerning the "Order Sustaining the Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)" [D.I. 1369] [[Docket No. 1455](#); filed April 16, 2025]
- vi. **Order Sustaining the Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)** [[Docket No. 1462](#); entered April 17, 2025]

Status: On April 17, 2025, the Court entered an order in connection with this matter resolving various claims subject thereto. The hearing on this matter as it relates to the *merits* of Solar Savings Direct, Inc.'s claim is continued to a date and time to be determined. As detailed in agenda item 17, a status and scheduling conference regarding Solar Savings Direct, Inc.'s claim and response will go forward at the hearing.

- 12. The Plan Administrator's Ninth Omnibus Objection to Certain Reclassified Claims, Partially Satisfied Claims, No Liability Claims, Substantive Duplicate Claims, and Insufficient Documentation Claims (Substantive) [[Docket No. 1370](#); filed February 28, 2025]

Response/Objection Deadline: March 21, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received:

- A. See **Exhibit B** attached

Related Documents:

- i. Re-Notice of "The Plan Administrator's Ninth Omnibus Objection to Certain Reclassified Claims, Partially Satisfied Claims, No Liability Claims, Substantive Duplicate Claims, and Insufficient Documentation

Claims (Substantive)” and Hearing Thereon [[Docket No. 1382](#); filed March 10, 2025]

- ii. Notice of Submission of Copies of Proofs of Claim [[Docket No. 1421](#); filed April 8, 2025]
- iii. Certification of Counsel Concerning the “Order Sustaining Plan Administrator’s Ninth Omnibus Objection to Certain Reclassified Claims, Partially Satisfied Claims, No Liability Claims, Substantive Duplicate Claims, and Insufficient Documentation Claims (Substantive)” [D.I. 1370] [[Docket No. 1456](#); filed April 16, 2025]
- iv. **Order Sustaining Plan Administrator’s Ninth Omnibus Objection to Certain Reclassified Claims, Partially Satisfied Claims, No Liability Claims, Substantive Duplicate Claims, and Insufficient Documentation Claims (Substantive)** [[Docket No. 1463](#); entered April 17, 2025]

Status: **On April 17, 2025, the Court entered an order regarding this matter. Consequently, no hearing with respect to this matter is required.**

13. Motion for Relief from Automatic Stay filed by Ally Bank d/b/a Ally Capital Corp. [[Docket No. 1402](#); filed March 19, 2025]

Response/Objection Deadline: April 15, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received: None

Related Documents:

- i. Notice of Submission of Copies of Proofs of Claim [[Docket No. 1421](#); filed April 8, 2025]
- ii. Certification of Counsel Regarding Order Approving Relief from the Automatic Stay to Proceed with Foreclosure [[Docket No. 1454](#); filed April 16, 2025]
- iii. **Order Terminating Automatic Stay Under Section 362 of the Bankruptcy Code** [[Docket No. 1461](#); entered April 17, 2025]

Status: **On April 17, 2025, the Court entered an order regarding this matter. Consequently, no hearing with respect to this matter is required.**

14. The Plan Administrator’s Tenth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive) [[Docket No. 1408](#); filed March 21, 2025]

Response/Objection Deadline: April 11, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received:

A. See **Exhibit C** attached

Related Documents:

- i. Notice of Submission of Copies of Proofs of Claim [[Docket No. 1421](#); filed April 8, 2025]
- ii. Certification of Counsel Concerning the “Order Sustaining Plan Administrator’s Tenth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)” [D.I. 1408] [[Docket No. 1458](#); filed April 16, 2025]
- iii. **Order Sustaining Plan Administrator’s Tenth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)** [[Docket No. 1464](#); entered April 17, 2025]

Status: **On April 17, 2025, the Court entered an order in connection with this matter resolving various claims subject thereto. The hearing on this matter as it relates to the Koala Insultation of Denver North claim is continued to a date and time to be determined. Consequently, no hearing with respect to this matter is required at this time.**

15. The Plan Administrator’s Eleventh Omnibus Objection to Certain Insufficient Documentation Claims, No Liability Claims, Reclassified Claims, Partially Satisfied Claims, and Amount Modify Claims (Substantive) [[Docket No. 1409](#); filed March 21, 2025]

Response/Objection Deadline: April 11, 2025 at 4:00 p.m. (EDT)

Responses/Objections Received:

A. See **Exhibit D** attached

Related Documents:

- i. Notice of Submission of Copies of Proofs of Claim [[Docket No. 1421](#); filed April 8, 2025]
- ii. Certification of Counsel Concerning the “Order Sustaining Plan Administrator’s Eleventh Omnibus Objection to Certain Insufficient Documentation Claims, No Liability Claims, Reclassified Claims, Partially Satisfied Claims, and Amount Modify Claims (Substantive)” [D.I. 1409] [[Docket No. 1457](#); filed April 16, 2025]
- iii. **Order Sustaining Plan Administrator’s Eleventh Omnibus Objection to Certain Insufficient Documentation Claims, No Liability Claims,**

Reclassified Claims, Partially Satisfied Claims, and Amount Modify Claims (Substantive) [[Docket No. 1465](#); entered April 17, 2025]

Status: On April 17, 2025, the Court entered an order in connection with this matter resolving various claims subject thereto. The hearing on this matter as it relates to the Ohio Department of Taxation claim is continued to a date and time to be determined. Consequently, no hearing with respect to this matter is required at this time.

V. CONTESTED MATTER GOING FORWARD:

16. Motion for Relief to Compel Completion, Transfer, or Removal of Solar Energy System [[Docket No. 1255](#); filed January 16, 2025]

Response/Objection Deadline: February 14, 2025 at 4:00 p.m. (EST)

Responses/Objections Received:

- A. Limited Objection and Reservation of Rights of the Plan Administrator to the “Motion for Relief to Compel Completion, Transfer, or Removal of Solar Energy System” [D.I. 1255] [[Docket No. 1337](#); filed February 13, 2025]
- B. Limited Objection and Reservation of Rights of the Plan Administrator to the “Movant’s Reply to Limited Objection and Motion to Compel Disclosure of Responsible Parties” [D.I. 1367] [[Docket No. 1447](#); filed April 15, 2025]

Related Documents:

- i. Movant’s Reply to the Limited Objection and Motion to Compel Disclosure of Responsible Parties [[Docket No. 1367](#); filed February 27, 2025]
- ii. Order Regarding Motions Filed by Nahum Gat [[Docket No. 1405](#); filed March 21, 2025]
- iii. Reply in Further Support of Motion to Compel Disclosure of Responsible Party and in Response to Limited Objection (D.I. 1447) [[Docket No. 1459](#); filed April 17, 2025]

Status: The hearing on this matter will go forward.

VI. STATUS/SCHEDULING CONFERENCE MATTER GOING FORWARD:

17. Solar Savings Direct, Inc.’s Response to the Plan Administrator’s Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive) [[Docket No. 1386](#); filed March 13, 2025]

Response/Objection Deadline: N/A

Responses/Objections Received:

A. See **Exhibit A** attached

Related Documents:

- i. Motion of Solar Savings Direct, Inc. for Allowance and Payment of Administrative Expense Claims Pursuant to 11 U.S.C. §503(b)(1)(A) [[Docket No. 1305](#); filed February 4, 2025]
- ii. The Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive) [[Docket No. 1369](#); filed February 28, 2025]
- iii. Re-Notice of "The Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)" and Hearing Thereon [[Docket No. 1381](#); filed March 10, 2025]
- iv. Letter to the Court Regarding Solar Savings Direct, Inc.'s Response to the Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive) [[Docket No. 1388](#); filed March 13, 2025]
- v. Notice of Submission of Copies of Proofs of Claim [[Docket No. 1421](#); filed April 8, 2025]
- vi. Plan Administrator's Preliminary Reply to "Solar Savings Direct, Inc.'s Response to the Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive)" [D.I. 1386] [[Docket No. 1452](#); filed April 16, 2025]
- vii. The Plan Administrator's Notice of Deposition of Solar Savings Direct, Inc. [[Docket No. 1453](#); filed April 16, 2025]

Status: A status and scheduling conference regarding Solar Savings Direct, Inc.'s response and asserted claim will go forward.

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Dated: April 17, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Jason M. Madron

RICHARDS, LAYTON & FINGER, P.A.

Kevin Gross (DE Bar No. 209)

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Counsel to the Plan Administrator

EXHIBIT A

The Plan Administrator's Eighth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive) [Docket No. 1369]

	RESPONSES	STATUS
INFORMAL RESPONSES		
1	NONE	
FORMAL RESPONSES		
2	Solar Savings Direct, Inc.'s – Claim No. 12576 [Docket No. 1386]	The Plan Administrator's objection to Claim No. 12576 is adjourned to a future omnibus hearing. A status and scheduling conference will go forward.

EXHIBIT B

The Plan Administrator's Ninth Omnibus Objection to Certain Reclassified Claims, Partially Satisfied Claims, No Liability Claims, Substantive Duplicate Claims, and Insufficient Documentation Claims (Substantive) [Docket No. 1370]

	RESPONSES	STATUS
INFORMAL RESPONSES		
1	Salesforce Inc. – Claim No. 12422	The Plan Administrator's objection to Claim No. 12422 has been resolved.
FORMAL RESPONSES		
2	Ohio Department of Job and Family Services – Claim No. 12490 [Docket No. 1393]	The Plan Administrator's objection to Claim No. 12490 has been resolved.

EXHIBIT C

The Plan Administrator's Tenth Omnibus Objection to Certain Late Claims and Amended and Replaced Claims (Non-Substantive) [Docket No. 1408]

	RESPONSES	STATUS
INFORMAL RESPONSES		
1	NONE	
FORMAL RESPONSES		
2	Koala Insulation of Denver North – Claim No. 12597 [Docket No. 1450]	The Plan Administrator's objection to Claim No. 12597 is adjourned to a future omnibus hearing.

EXHIBIT D

The Plan Administrator's Eleventh Omnibus Objection to Certain Insufficient Documentation Claims, No Liability Claims, Reclassified Claims, Partially Satisfied Claims, and Amount Modify Claims (Substantive) [Docket No. 1409]

	RESPONSES	STATUS
INFORMAL RESPONSES		
1	NONE	
FORMAL RESPONSES		
2	Ohio Department of Taxation and Ohio Department of Job and Family Services – Claim No. 10083 [Docket No. 1426]	The Plan Administrator's objection to Claim No. 10083 is adjourned to a future omnibus hearing.
3	Ohio Department of Taxation and Ohio Department of Job and Family Services – Claim No. 12491 [Docket No. 1426]	The Plan Administrator's objection to Claim No. 12491 has been resolved